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6 Attorneys for Defendants
7 HAYWARD AREA RECREATION AND PARK
DISTRICT and KEVIN HART

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH P. CUVIELLO and DENIZ
BOLBOL, individually,

Plaintiff,

V.

ROWELL RANCH RODEO, INC.,
HAYWARD AREA RECREATION AND
PARK DISTRICT, HAYWARD AREA
RECREATION AND PARK DISTRICT
PUBLIC SAFETY MANAGER/RANGER
KEVIN HART, and DOES 1 and 2, in
their individually and official capacities,
jointly and severally,

Defendants.

Case No. 3:23-cv-01652-VC

**DECLARATION OF NICHOLAS D. SYREN
IN SUPPORT OF DEFENDANTS' CROSS
MOTION FOR SUMMARY JUDGEMENT OR,
IN THE ALTERNATIVE, SUMMARY
ADJUDICATION AND OPPOSITION TO
PLAINTIFFS' JOINT MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Hon. Vince Chhabria

Date: August 15, 2024
Time: 10:00 a.m.
Ctrm: 4, 17th Floor

Trial: October 21, 2024

21 || I, Nicholas D. Syren, declare as follows:

22 1. I am an attorney licensed to practice before the United States District Court for the
23 Northern District of California. I am an associate at the law firm of Allen, Glaessner, Hazelwood
24 & Werth, LLP, and am counsel of record for defendants HAYWARD AREA RECREATION
25 AND PARK DISTRICT and KEVIN HART (“Defendants”) in this matter.

26 2. I have personal knowledge of the statements made in this declaration and could
27 competently testify to them if called as a witness.

28 3. Attached as Ex. "A," please find a true and correct copy of pertinent portions of

1 the deposition transcript of Joseph "Pat" Cuviello, taken on February 20, 2024.

2 4. Attached as Ex. "B," please find a true and correct copy of pertinent portions of
3 the deposition transcript of Deniz Bolbol, taken on March 6, 2024.

4 5. Attached as Ex. "C," please find a true and correct copy of pertinent portions of
5 the true transcript of the dialogue of events at Rowell Ranch Rodeo, taken on May 20, 2022,
6 taken from Plaintiffs Bolbol and Cuviello's video footage. The true transcript contains the
7 pertinent portions of dialogue of the events at Rowell Ranch Rodeo on May 20, 2022, produced
8 as County of Alameda's Document Production Bates 000368-000396.

9 6. Attached as Ex. "D," please find a true and correct copy of pertinent portions of
10 the true transcript of Alameda County Sheriff's Office Deputies Body Camera Footage, taken on
11 May 20, 2022. The true transcript contains the pertinent portions of dialogue of the events at
12 Rowell Ranch Rodeo on May 20, 2022, produced as County of Alameda's Document Production
13 Bates 000342-000367.

14 7. Attached as Ex. "E," please find a true and correct copy of body cam videos taken
15 by Alameda County deputy sheriffs Joshua Mayfield, Sowmaya Ramadas, Christian Campbell,
16 and Matthew Laszuk taken at Rowell Ranch Rodeo on May 20, 2022, and produced to all parties
17 at the time of County of Alameda's Initial Disclosures.

18 8. Attached as Ex. "F," please find a true and correct copy of Plaintiffs' Document
19 Production 000014-000017, evidencing videos taken at Rowell Ranch Rodeo on May 20, 2022.

20 9. Attached as Ex. "G," please find a true and correct copy of Plaintiffs' Document
21 Production 000021-000022 evidencing a photo taken of Plaintiffs and fellow demonstrators after
22 the incident involving Plaintiffs and Mr. Hart on May 20, 2022.

23 10. Attached as Ex. "H", please find the true and correct copy of Defendant County of
24 Alameda's Second Updated Rule 26 Disclosure.

25 11. Attached as Ex. "I", please find the true and correct copy of Defendants' Expert
26 James Dudley's Expert Report.

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1 I declare under penalty of perjury, under the laws of the United States of America, that the
2 foregoing is true and correct. Executed on July 1, 2024, at San Francisco, California.
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5 /s/ Nichols D. Syren

6 NICHOLAS D. SYREN
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